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VIA ECF

Hon. Vernon S. Broderick
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED *[Signature]*
VERNON S. BRODERICK
U.S.D.J. 07/08/22

Re: *Nadav Nahtomy v. FluidFreeRide LLC and Leitmotif
Services d/b/a FluidFreeRide LLC*
Civil Action No.: 1:22-cv-02363-VSB

Dear Judge Broderick:

Until recently, the plaintiff in the above referenced matter, Nadav Nahtomy, was represented by the law firm of Edelman Krasin & Jaye PLLC, where I was employed as an associate. I recently became employed by the law firm of Sacco & Fillas, LLP. Subsequently, the Plaintiff Nadav Nahtomy agreed to substitute the law firm of Edelman Krasin & Jaye PLLC with Sacco & Fillas, LLP.

On June 29, 2022, Sacco & Fillas, LLP transmitted a Consent to Change Attorneys to Edelman Krasin & Jaye PLLC. The respective firms are now actively working towards resolving disbursements, transferring the Plaintiff's case file and completing the attorney substitution.

On June 29, 2022, this Court also entered an Order and Notice of Initial Conference directing the parties to jointly submit a proposed case management plan and scheduling order by July 13, 2022. Pursuant to this Court's Individual Rules, Part 1(G), I respectfully request the Court to extend the parties time to submit a proposed case management plan for thirty (30) days, until August 12, 2022, based on the pending substitution of Plaintiff's attorneys. Plaintiff has not previously requested an extension of time and defense counsel consents to Plaintiff's request. It is respectfully submitted that a 30-day extension would provide sufficient time for transfer of Plaintiff's file to the incoming firm, Sacco & Fillas LLP.



Sacco & Fillas, LLP
Attorneys at Law

Thank you for your courtesy in this matter.

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Very truly yours,
SACCO & FILLAS, LLP

A handwritten signature in dark ink, appearing to read 'Bota', written over a light blue horizontal line.

Victor Bota, Esq. – VB8601

CC:
VIA ECF
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